

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.)
)
) No. 21-Cr-10255-MLW
(1) DEIVY ROBINSON PARADIS)
)
)
(2) ROBINSON PARADIS FELIZ)
)
)
Defendants)

JOINT STATUS REPORT PURSUANT TO LOCAL RULE 116.5(b)

Pursuant to Local Rule 116.5(b), the United States, by its undersigned counsel, respectfully submits the following joint status report regarding the above-captioned matter, which is currently set for a status conference at **10:00 a.m. on March 4, 2022**. A copy of this status report was provided to counsel for the defendants for review and editing. The defendants in this case are charged with one count of conspiracy to distribute and to possess with intent to distribute 400 grams or more of fentanyl in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)(vi).

I. Status of Automatic Discovery

The United States has produced Automatic Discovery materials. These materials include, *inter alia*, a search warrant materials, law enforcement reports, criminal history records, photographs, videos, laboratory reports, and recorded calls and text messages, cellular telephone extraction information, consent forms. The United States understands that it has an ongoing and continuing duty to produce discovery.

II. Additional Discovery

The United States anticipates that there may be a small amount of additional materials to be produced and/or made available as it continues to review its files. The United States is endeavoring to complete this review within the next several weeks. The United States understands that it has an ongoing and continuing duty to produce discovery.

III. The Timing of Additional Discovery Requests

If deemed necessary by defense counsel, the United States has no objection to this Court granting defense counsel additional time to review the provided discovery materials as well as the other discovery materials that are being made available before making any discovery requests and recommends that the Court schedule a final status conference in 60 days to determine whether any additional time is needed for review. To the extent that the defendant is afforded relief from the timing requirements, the United States requests similar relief.

IV. Protective Order

There are no protective orders and the United States does not anticipate requesting any at this time.

V. Pretrial Motions

The United States believes that it is too early to establish a motion date and requests that a motion date be set at the interim status conference.

VI. Timing of Expert Disclosures

The parties agree that expert disclosures will be due 30 days before trial for the government and 14 days before trial for the defendant.

VII. Periods of Excludable Delay

The Court excluded the time from the defendants' initial appearance and arraignment (on September 7, 2021) through the initial status conference (November 22, 2021). [Dkt. 10 & 13]. The Court also excluded the time from the defendant's initial status conference (November 22, 2021) through the interim status conference (January 4, 2022). [Dkt. 37 & 38]. The Court also excluded the time from the defendants' interim status conference (January 4, 2022) through March 4, 2022. [Dkt. 49]. To date, therefore, there have been no non-excludable days under the Speedy Trial Act.

VIII. Scheduling Matters

The parties respectfully request that the Court schedule a further status conference in approximately 60 days on a date convenient to the Court. If the interim status conference is continued, the parties agreed to exclude the time between the **March 4, 2022**, and the date selected for the further status conference for Speedy Trial Act purposes.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Craig E. Estes
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Craig E. Estes
CRAIG E. ESTES
Assistant U.S. Attorney

Dated: March 3, 2022